

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

August 28, 1980

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attention: Mr. Robert A. Clark, Chief  
Operating Reactors Branch No. 3  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 731  
LQA/WRM, NO/DWL  
Docket Nos. 50-338  
50-339  
License Nos. NPF-4  
NPF-7

Dear Mr. Denton:

AMENDMENT TO OPERATING LICENSES NPF-4 AND NPF-7  
NORTH ANNA POWER STATION UNITS NO. 1 AND NO. 2  
PROPOSED TECHNICAL SPECIFICATION CHANGE

Pursuant to 10 CFR 50.90, the Virginia Electric and Power Company hereby requests an amendment, in the form of changes to the Technical Specifications, to Operating Licenses NPF-4 and NPF-7 for North Anna Power Station, Units No. 1 and No. 2. The proposed changes are enclosed.

The proposed changes will transfer the independent review responsibility from the existing System Nuclear Safety and Operating Committee (SyNSOC) to the Safety Evaluation and Control (SEC) staff and will transfer the System Nuclear Safety and Operating Committee audit responsibilities to the Quality Assurance Department.

The Safety Evaluation and Control staff will be composed of a Director and a minimum of three staff members. The Director, Safety Evaluation and Control will report to the Manager, Nuclear Technical Services, who will advise the Executive Vice President-Power on the activities of the Safety Evaluation and Control staff. This organizational structure will assure that sufficient attention is directed towards examination and evaluation of safety concerns and that management is cognizant of the results of these Safety Evaluation and Control staff reviews.

The Safety Evaluation and Control staff will provide the independent reviews of station operational activities required by ANSI/ANS 3.2 (Administrative Controls and Quality Assurance Program for Operational Nuclear Power Plants), which are presently provided by the System Nuclear Safety and Operating Committee. The advantages of this proposed change are threefold.

First, the Safety Evaluation and Control staff is composed of individuals with direct nuclear experience in their respective technical disciplines. Presently, all Safety Evaluation and Control staff members meet or exceed the criteria for review "staff specialists"

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established in ANSI/ANS 3.1 (Standard For Selection and Training of Personnel for Nuclear Power Plants). Additionally, the Director, Safety Evaluation and Control exceeds the criteria established by ANSI/ANS 3.1 for the Supervisor of an independent review staff. Future Safety Evaluation and Control staff members may not meet the qualification criteria for "staff specialists" positions; however, such individuals will not be directly involved in the independent review function of Safety Evaluation and Control.

Secondly, the independent reviews of station operational activities by the Safety Evaluation and Control staff will be performed on a continuous basis as part of their routine responsibilities. This is in contrast to an intermittent or scheduled review approach committee; therefore, the Safety Evaluation and Control reviews will be responsive to station time constraints while also providing a more comprehensive review of items presently processed by the System Nuclear Safety and Operating Committee.

Finally, other Safety Evaluation and Control staff routine responsibilities require continuous review of industry-wide operational experience, technical information, and regulatory issues. This effort should maintain a high level of "state-of-the-art" expertise within Safety Evaluation and Control regarding operational activities and general industry concerns. It is anticipated that the Safety Evaluation and Control staff will provide the majority of the technical input to independent review activities; however, technical consultants and in-house specialists will be utilized for special concerns when Safety Evaluation and Control review requires additional expertise.

As a result of this change, safety will be enhanced by the proposed transfer of independent review responsibilities from the System Nuclear Safety and Operating Committee to the Safety Evaluation and Control staff by upgrading the quality and timely processing of the independent reviews of station operational activities.

Specification 6.5.2.8 for North Anna Units No. 1 and No. 2 requires the performance of audits of station activities under the cognizance of the System Nuclear Safety and Operating Committee. As a result of this proposed change, the audit responsibilities outlined in Specification 6.5.2.8, which are presently being performed under the cognizance of the System Nuclear Safety and Operating Committee by the Quality Assurance Department, will be transferred to the Quality Assurance Department. Such a transfer will provide for appropriate organizational channels for the reporting of audit results, ensure the availability of appropriate technical expertise for the performance of these audits, and ensure that these audits are performed in an effective and timely manner.

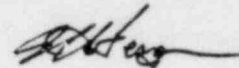
In our letter dated July 30, 1980 (Serial No. 487), we proposed changes to revise Section 6.0 ADMINISTRATIVE CONTROLS to reflect the addition of an Assistant Station Manager position at North Anna Power Station. Those proposed changes are included in this request.

In our July 30, 1980 letter, we proposed a change to the North Anna Unit No. 1 and No. 2 Environmental Technical Specifications which would revise the requirement for the Supervisor, Quality Assurance, Operations and Maintenance to perform independent audits of the implementation of the Environmental Technical Specifications by transferring this responsibility to the Supervisor, Quality Assurance Engineering. This proposed change is being modified to reference the Quality Assurance Department as having responsibility for the performance of the audits of the implementation of the Environmental Technical Specifications.

This request has been reviewed and approved by the Station Nuclear Safety and Operating Committee and the System Nuclear Safety and Operating Committee. It has been determined that this request does not involve an unreviewed safety question.

We have reviewed this request in accordance with the criteria in 10 CFR 170.22. It has been determined that this request involves a single safety issue; therefore, a Class III license amendment fee is required for Unit 1 and a Class I license amendment fee is required for Unit 2. Accordingly, a voucher check in the amount of \$4,400.00 is enclosed in payment of the required fees.

Very truly yours,



J. H. Ferguson  
Executive Vice President-Power

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Attachments:

1. Proposed Technical Specification Change - Unit 1
2. Proposed Technical Specification Change - Unit 2
3. Proposed Environmental Technical Specification Change
4. Voucher Check No. 02822 for \$4,400.00

cc: Mr. B. Joe Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
Region 7

COMMONWEALTH OF VIRGINIA )  
 ) S. S.  
CITY OF RICHMOND )

Before me, a Notary Public, in and for the City and Commonwealth aforesaid, today personally appeared J. H. Ferguson, who being duly sworn, made oath and said (1) that he is Executive Vice President-Power of the Virginia Electric and Power Company, (2) that he is duly authorized to execute and file the foregoing Amendment in behalf of that Company, and (3) that the statements in the Amendment are true to the best of his knowledge and belief.

Given under my hand and notarial seal this 28<sup>th</sup> day of August, 1980.

My Commission expires January 19, 1982.

Evelyn Cherry Garos  
Notary Public  
(I was commissioned as Evelyn Cherry Garos)

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